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August 10, 2007

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**Re: Winifred Blackledge v. Alabama Department of Mental Health &
Mental Retardation and Commissioner John Houston
Civil Action No.: 2:06CV321**

Dear Rebecca:

I am writing in response to your letters dated August 6 and August 8, 2007.

Regarding Exhibit T, this document was not in my possession until a few days prior to filing the Response to Defendants' Motion for Summary Judgment. This document was not made relevant until Defendants raised a timeliness argument in the Motion for Summary Judgment. Furthermore, such document should have been included in your response to my requests for production as it was created by your client, the Alabama Department of Mental Health and Retardation, and therefore was already in your possession. Finally, you did not send any interrogatories or request for production and this document was not responsive to any proper request in Ms. Blackledge's subpoena duces tecum.

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It is my position that you do not have grounds to file a motion to strike. The document was served on you within a few days after it was in my possession. If you intend to file a Motion to Strike I will have to consider my options as well if I am forced to have to spend time responding to such a motion that is without merit.

Regarding Ms. Blackledge's deposition, I will allow you to question Ms. Blackledge on documents that were not previously produced and those which were not already in your possession at the time of her first deposition. If the documents were already in your possession at that time, you could have inquired about those documents during this first deposition. However, I will not object to your questions regarding the CSS III scoring sheets (Exh. UU), Ms. Blackledge's confidential medical records or Exhibit T.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Joshua D. Wilson', with a stylized, cursive script.

Joshua D. Wilson

JDW/mw